

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

Plaintiff,

**DEFENDANT WRIGHT'S  
INITIAL DISCLOSURE**

v.

07 Civ 4651(SHS)

WILLIAM WRIGHT, 310 WEST 56<sup>TH</sup>  
STREET CORPORATION, BAYVIEW  
LOAN SERVICING LLC, NEW YORK  
STATE DEPARTMENT OF TAXATION  
AND FINANCE, AMERICAN EXPRESS  
CENTURION BANK, NEW YORK CITY  
DEPARTMENT OF FINANCE, and JOHN  
DOES 1-10,

Defendants.

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To: MICHAEL J. GARCIA

United States Attorney for the  
Southern District of New York  
Attorney for the United States of America  
By: Daniel P. Filor, AUSA  
86 Chambers Street, 3<sup>rd</sup> Floor  
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(212) 637-2726

RAJAN PATEL

Attorney for Defendant Bayview Loan Servicing, LLC  
747 Chestnut Ridge Road, Suite 200  
Chestnut Ridge, NY 10977  
(845) 352-3434

Kauffman, Friedman, Plotnicki & Grun, LLP  
Attorneys for Defendant 310 West 56<sup>th</sup> Street Corporation  
300 East 42<sup>nd</sup> Street  
New York, NY 10017

Defendant William Wright, *Pro Se*, files this Initial Disclosure to Plaintiff pursuant to Rule 26 of the Federal Rules of Civil Procedure. This disclosure may not be complete. As

soon as any other information required to be disclosed is discovered, defendant Wright will forward it.

**(1) INITIAL DISCLOSURES**

(a) The name and, if known, the address and telephone number of each individual likely to have information that bears significantly on any claim or defense, identifying the subjects of the information, and a brief, fair summary of the substance of the information known by the person:

Anthony Spina  
TCP Reliable Manufacturing, Inc., 551 Raritan Center Parkway, Edison, NJ 08837,  
(732) 346-9200  
Anthony Spina will testify as to payment to the US Treasury of the sum of \$3,500.00 owed by TCP to defendant Wright, such payment having been made pursuant to Notice of Levy dated 1/10/2007.

Christel Hughes  
JPMorgan Chase Bank, NA, P.O. Box 260180, Baton Rouge, LA, 70826-0180,  
(225) 332-7857  
Christel Hughes will testify that as to of the garnishment by the IRS of some \$2,635.00 from defendant Wright's account at Chase in or about January, 2006.

William Wright  
310 West 56<sup>th</sup> Street, #14A, New York, NY 10019  
(212) 757-5689  
William Wright, defendant in this case, will testify as to the sum due him from TCP and the ownership of the funds in the Chase account.

(b) Copies of all documents, data compilations, and tangible things in the possession, custody or control of the party likely to bear significantly on any claim or defense:

Records have been ordered from TCP Reliable and JPMorgan Chase. Upon completion of these record requests, the records will be forwarded to plaintiff.

(c) A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material on which such computation is based, including materials bearing on the nature and extent of the injuries suffered.  
Defendant Wright has no information regarding this category.

(d) For inspection and copying under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all a judgment which may be entered in the action or to indemnify or reimburse for payments to satisfy the judgment.  
Defendant Wright has no information regarding this category.

**(2) DISCLOSURE OF EXPERT TESTIMONY**

The identity of any person who may be used at trial to present evidence under Rules 702, 703 or 705 of the Federal Rules of Evidence:

None at this time.

**(3) PRETRIAL DISCLOSURES**

The name and, if not previously provided, the address and telephone number of each each witness, separately identifying those whom the party expects to present and those whom the party may call if the need arises:

See parts (1)(A) and (2) above.

(b) The designation of those witnesses whose testimony is expected to be presented by means of a deposition and, if not taken stenographically, a transcript of the pertinent portions of the deposition testimony.

None at this time.

(c) An appropriate identification of each document or other exhibits, including summaries of other evidence, separately identifying those which the party expects to offer and those which the party may offer if the need arises.

See part (1)(b) above.

Dated: September 28, 2007

Respectfully submitted,

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WILLAM WRIGHT WW0750  
250 West 57<sup>th</sup> St., Suite 814  
New York, N 10107  
(212) 307-9393

**CERTIFICATION**

I hereby certify that to the best of my knowledge, information and belief, such disclosure is complete and correct as of this time.

Dated: September 28, 2007

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WILLIAM WRIGHT WW0750

CERTIFICATE OF SERVICE

I certify that on September 28, 2007 I served a copy of the foregoing disclosure upon the plaintiff and defendants Bayview Loan Servicing, LLC and 310 West 56<sup>th</sup> Street Corporation mailing same to each attorney of record indicated above by first class mail, postage prepaid.

Dated: September 28, 2007

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William R Wright WW0750